

REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested.

Claims 1, 5, 6, 9, 12, 14, 17, 19-21 and 25-30 are present in this application, claims 29 and 30 are added by way of the present amendment. Claims 5, 6, 12, 17, 21 and 25-28 are allowed. As a result of the previous response, the 35 U.S.C. §112, first paragraph, rejection is withdrawn and the 35 U.S.C. §103(a) rejections are maintained. In particular, under 35 U.S.C. §103(a), claim 1 stands rejected over JP 07-310187 (Nozawa et al.) in view of U.S. 4,282,924 (Faretra et al.) and U.S. 6,096,161 (Kim et al.), claims 14 and 20 stand rejected over Nozawa et al. in view of Faretra et al. and claims 9 and 19 stand rejected over Nozawa et al. in view of U.S. 5,405,491 (Shahvandi et al.).

The Applicants greatly appreciate the discussion of the Advisory Action which took place between their representative and Examiner Kackar on October 20, 2003. In particular, Examiner Kackar expressed his view that the silicone rubber disclosed in Faretra, Eccosil 4952, is electrically conductive. The Applicants disagreed and stated that column 3, line 33 - column 4, line 2 only discusses thermal conductivity. The Applicants further argued that no cited reference discloses an electrically conductive and heat resistant elastic member. No agreement was reached on this issue and the Applicants' representative stated he would endeavor to provide evidence that Eccosil 4952 is electrically insulative, and not electrically conductive. Examiner Kackar stated that he would reconsider his rejection if such evidence were provided.

Attached hereto are Attachments 1-3 consisting of a research report regarding materials for high temperature electro-insulating materials found at <http://202.31.141.11/istc-pra/pratext/prat130.doc> listing Eccosil 4952 on page 3, a datasheet for STYCAST® 4952 describing its volume resistivity as $>10^{14}$ ohm-cm (clearly insulating), and STYCAST® 4952 product literature stating, on page 3, that STYCAST® 4952 was previously called ECCOSIL

4952. This evidence clearly shows that ECCOSIL 4952 is not electrically conductive but is rather electrically insulative. The Applicants would like to note that ordinary silicone rubber has a volume resistance of about 10^{14} - 10^{16} ohm-cm.

The attachments show that no reference or combination of references of record discloses or suggests the claimed worktable device (claim 1) or apparatus (claim 14) as the only reference relied upon to reject the claims regarding an electrically conductive and heat-resistant elastic member is the Faretra patent. This patent only describes a “pliable thermally conductive layer” (column 3, lines 35-36) or “thermally conductive silicone rubbers” (column 3, lines 65-66) and gives the example of ECCOSIL 4952, which is clearly electrically insulative. Accordingly, withdrawal of the §103(a) rejection of claims 1 and 14 is in order since the combination of references does not disclose or suggest the claimed invention, in particular, a worktable device having a heat transfer medium consisting essentially of an electrically conductive and heat resistant elastic member selected from the group consisting of conductive silicone rubber and conductive fluororubber. To the contrary, the cited prior art discloses and suggests electrically insulative materials.

New claims 29 and 30 recite a heat transfer medium consisting essentially of an electrically conductive and heat-resistant elastic member, which is clearly not suggested by the cited prior art.

It is respectfully submitted that the present application is in condition for allowance and a favorable decision to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



Gregory J. Maier
Attorney of Record
Registration No. 25,599

Carl E. Schlier
Registration No. 34,426

Customer Number
22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 08/03)

GJM/CES/maj
I:\ATTY\CES\206342US.AM4.DOC